



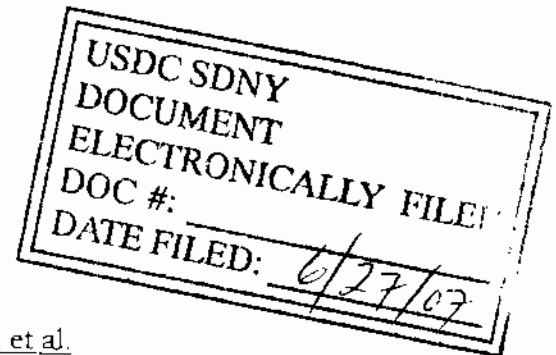
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June 26, 2007

By Facsimile (212) 805-7941
Honorable Loretta A. Preska
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1320
New York, New York 10007



Re: Sharon Garcia v. The City of New York, et al.
07 CV 4777 (LAP)

Your Honor:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for the defendant City of New York in this civil rights action alleging police misconduct. I am writing to respectfully request a sixty day extension of time from July 1, 2007 to August 31, 2007, to respond to the complaint on behalf of the City of New York. Counsel for the plaintiff consents to a thirty day extension; he does not consent to the sought-after sixty day extension.

There are several reasons for seeking an extension of time to respond in this matter on behalf of the City. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Here, plaintiff, Sharon Garcia, alleges that she was subjected to an illegal entry, false arrest, and an illegal strip search on or about March 30, 2007. Plaintiff does not allege that charges were brought against her, and assuming that this allegation is true, the records relating to this arrest have been sealed. Currently, this office is in the process of forwarding to plaintiff's counsel for execution a consent and authorization for the release of the records that have been sealed pursuant to N. Y. Criminal Procedure Law § 160.50. The executed release is necessary for our office to obtain the District Attorney, Criminal Court and police records pertaining to the alleged arrest and illegal searches. This office is also in the process of forwarding to plaintiff's counsel for execution medical releases which are necessary for our office to obtain the medical records pertaining to plaintiff's alleged injuries and treatment.

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Accordingly, we respectfully request that the City's time to respond to the complaint be extended until August 31, 2007. No previous request for an extension of time to respond to the complaint has been made in this action.

I thank the Court for its time and consideration of this request.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

June 26, 2007

Respectfully submitted,

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